## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA Philadelphia Division

George Fox, Lauren Fox, Case No. 20-10524-AMC Chapter 13

Debtors.

## Motion to Modify Plan After Confirmation

Debtor George Fox and Joint Debtor Lauren Fox, through their attorney, move this Court as follows:

- 1. The Joint Debtor recently inherited substantial property. Exhibit A.
- 2. The inheritance necessitates full payment of unsecured creditors in this bankruptcy case.
- 3. The Debtors request that the Court enter an order approving the plan filed at ECF No. 56 as the new confirmed plan.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtors' favor if necessary and proper under the law.

Date: August 9, 2024

CIBIK LAW, P.C. Attorney for Debtors

By:/s/ Michael A. Cibik

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